EXHIBIT E

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

<table>
<tr><td>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

This Document Relates to All Actions</td><td>MDL No. 2875

Honorable Robert B. Kugler, District Court Judge

Honorable Karen M. Williams, Magistrate Judge</td></tr>
</table>

<u>DECLARATION OF MEG RUTHENBURG</u>

I, Meg Ruthenburg, state:

1.   I am the Senior Director of Operations at GLOBO Language Solutions located in Wyncote, Pennsylvania where I oversee our translation department. My curriculum vitae is attached as Attachment A.

2.   I have over 20 years' experience in the translation industry. In my role, I have overseen translations from and into many languages and have used and implemented different translation technology tools. Given this experience, I am well-positioned to explain the relative quality of translations performed by different methods.

3.   The industry-standard for quality translation entails a three-step process of

translation by one linguist, editing by a second, and proofreading by a third.

Having multiple human translators reviewing every translated document reduces

the risk for error. This industry standard for translation is what is required by the

ISO certification for translation services (ISO 17100:2015) which specifically

dictates that multiple steps must be used.

4.   GLOBO is ISO 17100 certified, and I have personally led the annual audits

of this certification. As an added layer of confidence for our clients, by using

human translators GLOBO is able to offer certificates of translation in which our

translators attest that the translation is a true, accurate, and complete translation of

the original document. GLOBO routinely provides such attestations for translations

used in legal proceedings.

5.   Non-professional machine translation using a tool like Reverso is unable to

match the quality and accuracy of translations that have undergone the human

translation process as called for in the ISO 17100 certification.

6.   In addition, non-professional machine translation is particularly unreliable

for highly-technical content. Since there is no human translator or editor, machine

translations produced in this manner cannot be certified.

7.   I use the term "non-professional machine translation" to differentiate from

some of the advanced machine translation technologies that use artificial

intelligence and neural networks to produce superior-quality translations. These

advanced systems depend on training the translation engine to produce accurate

translations by inputting data sets and validating the translation choices produced

by the engine. This requires the input of humans or pre-existing databases of

validated translations to help the translation engine learn. This is not the type of

machine translation users of Reverso access.

8.   Attached to my declaration are:

A.   A Chinese document that was marked at the deposition of Qiangming

Li as Exhibit 266, a Reverso translation of that document that was marked at the

deposition of Mr. Li as Exhibit 266A, and a human translation of the document

conducted by GLOBO. *See* Attachment B.

B.   A Chinese document that was marked at the deposition of Qiangming

Li as Exhibit 272, a Reverso translation of that document that was marked at the

deposition of Mr. Li as Exhibit 272A, and a human translation of the document

conducted by GLOBO. *See* Attachment C.

9.   For each of the above referenced documents, the comparison between the

Reverso and the GLOBO translation reveals that the Reverso translation is wholly

inadequate.

10.   The Reverso translations of English documents, which are being presented

to Chinese ZHP witnesses at their depositions, are no better.

        I declare under penalty of perjury that the foregoing is true and correct to the

best of my knowledge.

Dated: April 19, 2021

                                        _____
                                        Meg Ruthenburg
                                        Senior Director of Operations
                                        GLOBO Language Solutions

4

ATTACHMENT A

MEG RUTHENBURG

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PROFESSIONAL EXPERIENCE

GLOBO, Wyncote, PA   April 2018-Present

Senior Director of Operations, January 2019 – Present

- Manages translation, on-site interpreting, and scheduled video interpreting service lines.
- Oversee quality assurance policy and ensured adherence to service level agreements.
- Forms an active part of GLOBO's leadership team, making decisions about the growth and development of the company and service offerings.

Director of Service Operations, April 2018 – December 2018

CYRACOM, Tucson, AZ   January 2010-November 2017

Director of Translation and Localization, May 2012-November 2017

Management:
- Recruited and mentored a streamlined localization team capable of handling an 180% increase in the number of projects completed.
- Restructured the organization to add several new job roles that created a more efficient division of labor, increased productivity, and provided paths for advancement that helped retain talented employees.
- Crafted a project management scorecard to track productivity and created better accountability of Project Managers.
- Negotiated lower rates from primary vendors which led to more competitive customer pricing.

Process Improvements:
- Redesigned the communications platform and practices to improve exchanges between remote teams, sales, and project management.
- Oversaw major technology improvements including virtual desktop infrastructure, selection and implementation of a new translation management system, a computer assisted translation tool to improve response time on quotes and improved security of data, as well as greater automation of vendor and customer invoicing.
- Used strong customer service acumen to resolve customer complaints and increase customer satisfaction.

Collaborations:
- Participated in joint sales calls to use industry knowledge to help close sales.
- Pooled resources with the RFP team to author a library of content to respond to RFPs much faster.
- Worked with the IT department to design a platform for data security with more automated project management tools.
- Teamed up with finance to improve the customer invoice process allowing faster turnaround on accounts receivable, and a better process for vendor invoicing to mend the accuracy of financial reports.

Senior Project Manager, January 2010-May 2012
- Managed 31% of the department's total revenue in 2011, far greater than any other PM, by self-learning PM software to more efficiently manage large multi-phase eLearning projects, leading to promotion as Director.
- Chaired sales meetings, new customer implementations, and trainings.
- Assigned to mentor other PMs to give them the tools and training to move them from small transactional work to handling larger more complex projects.

LANGUAGE LEARNING ENTERPRISES, Washington, DC   September 2007-December 2009

Language Learning Enterprises (LLE) was recognized as a leading provider of language services for government.

Project Manager
●   Managed $1 million in revenue as part of a two-person team until the firm was purchased by CyraCom in 2009.

SELF-EMPLOYED, Philadelphia, PA   January 2002-January 2010

●   Used medical knowledge and Spanish-language skills to translate a broad range of medical and healthcare-related material as well as acted as a interpreter for limited English speaking patients.
●   Clients included Children's National Medical Center, University of Michigan Health System, the VA's National Center for Health Promotion and Disease Prevention (NCP), USDA Office of Civil Rights, and The Timberland Group.
●   Closed the business to focus full-time on project management for CyraCom.

WOODROW WILSON CENTER FOR INTERNATIONAL SCHOLARS, Washington, DC   2002-2005

The Woodrow Wilson Center is the living, national memorial to President Wilson, established by Congress in 1968; it is a nonpartisan institution, supported by public and private funds, engaged in the study of national and world affairs.

●   Developed and administered research projects on economic development and democracy in Latin America, including procuring and managing grants.
●   Authored and edited conference reports, newsletters, and other in-house publications.
●   Mentored student interns and junior colleagues leading many to pursue successful careers in government and the non-profit sector.

EDUCATION AND TRAINING

Master of Art, Anthropology   2000
UNIVERSITY OF MICHIGAN   Ann Arbor, MI

Bachelor of Art, Spanish and Anthropology   1997
MACALESTER COLLEGE   St. Paul, MN

OTHER ACADEMIC TRAINING
●   Human Anatomy and Physiology, Washtenaw Community College, Ann Arbor, MI, 2006
●   DONA Certified Doula Training, Center for the Childbearing Year, Ann Arbor, MI 2005

VOLUNTEER WORK

●   Court Appointed Special Advocate for Children (CASA), use Spanish language skills to advocate for the best interests of Spanish-speaking children in the foster care system
●   DONA International-trained birth doula, use Spanish language skills and medical knowledge to support low-income Spanish-speaking clients through childbirth and postpartum care.

ATTACHMENT B

This attachment contains Restricted Confidential Information pursuant to the Confidentiality and Protective Order (ECF 139) and has been provided directly to the Court and to Plaintiffs' liaison counsel.

ATTACHMENT C

This attachment contains Restricted Confidential Information pursuant to the Confidentiality and Protective Order (ECF 139) and has been provided directly to the Court and to Plaintiffs' liaison counsel.